

To: FCC

Re: Lightsquared/ GPS interference.

Simply put, Lightsquared's original proposal to occupy the block of bandwidth immediately adjacent to the block currently occupied by GPS is dangerous and will cause radical change to many sectors of our economy.

Aviation isn't the only industry that would be harmed by loss of clear and reliable signal. Industrial construction and agriculture would be harmed if not completely inhibited without clear and reliable GPS signal. In agriculture, for example, not only has the majority of our industry invested heavily in GPS equipment for use in site specific applications and precision guidance, all of our equipment investments for the last 5 years have been made with the assumption that GPS based guidance will be available to us indefinitely. Some of our implements are of a size and width (132 foot sprayer booms for example), that manual piloting is not feasible. For this reason, the lost investment would be much greater than cost for GPS receivers and controls.

For these reasons I would humbly ask the FCC do the following:

The FCC must make clear, and the NTIA must ensure, that LightSquared's license modification is contingent on the outcome of the mandated study unequivocally demonstrating that there is no interference to GPS. The study must be comprehensive, objective, and based on correct assumptions about existing GPS uses rather than theoretical possibilities. Given the substantial pre-existing investment in GPS systems and infrastructure, and the critical nature of GPS applications, the results of studies must conclusively demonstrate that there is no risk of interference. If there is conflicting evidence, doubts must be resolved against the LightSquared terrestrial system. The views of LightSquared, as an interested party, are entitled to no special weight in this process.

The FCC should make clear that LightSquared and its investors are proceeding at their own risk in advance of the FCC's assessment of the working group's analysis. While this is the FCC's established policy, the Commission's International Bureau failed to make this explicit in its order.

Resolution of interference has to be the obligation of LightSquared, not the extensive GPS user community of millions of citizens. LightSquared must bear the costs of preventing interference emanating from their devices, and if there is no way to prevent interference, it should not be permitted to operate. GPS users or providers should not have to bear any of the consequences of LightSquared's actions.

Thank you for your consideration.

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